



October 15, 2010

Delivered via Federal Express

US Environmental Protection Agency, Region VI
Ms. Janet Brooks, EPA Region VI Brownfields Coordinator
1445 Ross Avenue, Suite 1200 (6SF-VB)
Dallas, Texas 75202-2733
Phone: (214) 665-7598
e-mail: Brooks.Janet@epa.gov

Environmental Management Support, Inc.
Attn: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, Maryland 20910
Phone: (301) 589-5318

Dear Ms. Brooks:

We are pleased to submit the City of Dallas' proposal for a Brownfields combined community-wide hazardous substances and petroleum assessment grant from the U.S. Environmental Protection Agency (EPA). The City recognizes that Brownfields redevelopment along with sustainable development is essential to the economic vitality of Dallas. That is why Dallas is requesting these assessment funds to reinstate Dallas' Brownfield program and bolster the City's sustainable development initiatives. The program will continue to be utilized for Phase I and Phase II assessments and Phase III cleanup plans that specifically encourage and facilitate the establishment of neighborhood amenities and employment opportunities across the City.

Although it is a community-wide grant, special focus will be on the southern city council districts (Districts 1 through 8). These districts have been historically discriminated against during Dallas' political system development. As development of the City shifted toward large supermarkets and large box retailers, small businesses shut down, leaving numerous vacant and underutilized properties, especially in the City's southern sector. Additionally, due to the economic disadvantage in these areas, historic industrial development was highest in these areas; however, as industrial businesses moved to new areas, large industrial properties have been left vacant in these communities, leaving stigmatized properties lying dormant with fewer jobs in these areas. As the City has continued to develop to its limits, development has focused more on infield properties and previously developed properties. The stigma of contamination has limited development of these blighted properties in the southern sector from being developed, despite the available space, community need and large number of potential workers available in these areas. The Brownfield grants will help assess these blighted, vacant and underutilized properties, creating jobs in the portions of the City with greatest need.

Involving the local community in cleanup decisions and reuse plans will be crucial to the success of the program. Grant funds will be allocated for outreach efforts to raise awareness among the

community on how identification and redevelopment of Brownfield sites complement an overall community revitalization and reinvestment strategy.

As requested, applicant information is as follows:

a. Applicant Identification

City of Dallas, 1500 Marilla Street, Dallas, Texas 75201

b. DUNS and CAGE Numbers

DUNS # 196616478 - , CAGE # - 39VA6

c. Funding Requested

i) Combined assessment, ii) \$400,000 combined assessment grant, iii) \$200,000 Hazardous Substance and \$200,000 Petroleum, iv) Community-wide

d. Location

City of Dallas, Dallas County, Texas

e. Property-Specific Determination

Not applicable – not a property-specific application.

f. Project Contacts

Project Director:

Lori Frauli Trulson

Phone: 214-671-8967 Fax: 214-670-0134

Lori.trulson@dallascityhall.com

Office of Environmental Quality

1500 Marilla Street, L2FS

Dallas, Texas 75201

Chief Executive/Highest Ranked Officer:

Mary K. Suhm

Phone: 214-670-3297 Fax: 214-670-5798

mary.suhm@dallascityhall.com

1500 Marilla Street

Dallas, Texas 75201

g. Date Submitted

October 15, 2010

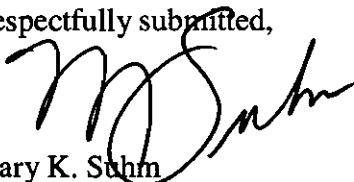
h. Project Period

October 1, 2011 to September 30, 2014

i. Population

1,277,082 based on the 2008 Census American Community Survey estimate

Respectfully submitted,



Mary K. Suhm
City Manager

III.C. Threshold Criteria for Assessment Grants

1. Applicant Eligibility

The applicant is the City of Dallas, Texas, an incorporated municipality within Dallas County, Texas.

2. Letter from the State or Tribal Environmental Authority

A letter from the Texas Commission on Environmental Quality (TCEQ) is attached.

3. Site Eligibility and Property Ownership Eligibility

Not applicable. The City of Dallas is submitting a Community-Wide Assessment Grant proposal, not a site-specific grant.

V.B. Ranking Criteria For Assessment Grants

1. Community Need

The City of Dallas serves the needs of more than one million residents (1,277,082), while continuing to address the social, economic, and environmental obstacles, which prevent the Dallas community from becoming truly sustainable. These challenges matured over time and only relatively recently became realized.

Historically, the City of Dallas responded to community need situations as they arose, resolving problems and then quickly moving on to the next item which needed attention. The historic “reaction without forethought” resulted in unbalanced growth throughout the city for generations, creating a divide between the northern and southern portions of the City. As a result, barriers arose and amplified for residents living in the overlooked areas in the southern sector of the City.

Complicating matters, Dallas, like many other communities, grew up in the age of the automobile. In their effort to help residents realize the American dream with stable jobs in the city and a comfortable life in the suburbs, city leaders focused on providing quick access for commuters travelling to and from work and housewives travelling to and from the grocery store. This was accomplished through the construction of elevated lanes of highway traffic to allow goods quick access through and to the city. This resulted in neighborhoods being cleaved in half and a shift in trade from within the neighborhood out to the routes servicing the mobile citizenry, which passed through Dallas on its way somewhere else. Small, local businesses suffered and many shut their doors after generations of service to their community leaving their buildings to stand defenseless against the ravages of time. These locations are concentrated in the southern sector of the City, which is the primary focus area for this application.

Prior to 1991, the City of Dallas maintained various forms of representative government including Aldermen from 1856 to 1907, a Mayor-Commissioner body from 1907 to 1931, a Council-Manager body, with nine places from 1931 to 1968. The Council changed from a nine-member body to an eleven-member body in April 1969 with the Mayor as the eleventh place. The system called for the election of 8 in-district Council members and 3 at-large Council members understanding “the City Council shall, not less than every two years, determine as

nearly as practicable the population of the respective districts and shall, by ordinance, revise the boundaries of any or all of said districts to maintain a substantial equality of population in each.” This arrangement was found to be less than equitable and became a topic of national attention in the late 1980s and early 1990s when U.S. District Judge Jerry Buchmeyer wrote that minority participation in Dallas politics had been a question of “what blacks and Hispanics have been permitted to do by the white majority”. This resulted, partially, from civil action challenging the earlier methods of electing representation to the City Council which were perceived to disadvantage certain groups.

To resolve the disparity, Judge Buchmeyer struck down the then 8-3 election system in 1990 and the current system of 14 City Council members, each from a separate Council District, and one at-large Mayor was established in 1991. Through this system, areas with minority populations could now be better represented on the City Council and resources would now be spread across the entire city and not just those areas which were vocal or economically stronger.

Dallas had begun the great work to restore itself. The restructuring of the City Council was vital to this re-awakening. The paternalistic approach to governing, regardless of how or why it came to be, would only continue to perpetuate the “reactive” approach which led the city to the circumstances which it now faced – a community divided socially, geographically and economically: a growing north versus a declining south.

City of Dallas Population, Employment and Income by City Council District								
Council District	White	Black	Hispanic	Other	Jobs / Acre	Median HH Income	Median HH Size	Poverty Rate
Citywide	29.0%	22.3%	44.6%	4.1%	4.9	\$ 48K	2.7	17.4 %
Southern Sector								
1	12.4 %	5.6 %	80.4 %	1.6 %	2.2	\$ 41K	3.7	21.9 %
2	14.3 %	10.3 %	70.6 %	4.8 %	14.7	\$ 38K	3.1	24.7 %
3	19.2 %	36.0 %	42.4 %	2.4 %	1.5	\$ 44K	3.4	19.9 %
4	9.5 %	59.2 %	29.8 %	1.5 %	1.0	\$ 36K	3.3	23.8 %
5	11.9 %	54.7 %	32.0 %	1.4 %	0.8	\$ 41K	3.4	19.5 %
6	11.0 %	9.8 %	77.1 %	2.1 %	9.8	\$ 40K	3.6	24.5 %
7	15.0 %	53.1 %	28.6 %	3.3 %	1.8	\$ 31K	2.9	29.0 %
8	20.1 %	57.0 %	21.4 %	1.5 %	0.8	\$ 39K	3.1	18.6 %
Northern Sector								
9	55.9 %	13.6 %	26.2 %	4.3 %	1.5	\$ 53K	2.5	10.2 %
10	48.3 %	29.0 %	14.1 %	8.6 %	5.7	\$ 50K	2.4	10.8 %
11	53.9 %	9.7 %	28.7 %	7.7 %	13.4	\$ 56K	2.2	13.1 %
12	74.5 %	7.0 %	8.3 %	10.2 %	4.9	\$ 69K	2.1	4.5 %
13	61.0 %	10.6 %	4.0 %	24.4 %	7.1	\$ 69K	2.5	9.4 %
14	67.0 %	9.5 %	18.7 %	4.8 %	20.6	\$ 58K	1.9	12.3 %

City of Dallas Formal Education by City Council District						
Council District	Some School	High School	Some College	Assoc. Degree	Bach. Degree	Grad. Degree
1	51.0 %	23.4 %	11.8 %	3.1 %	6.7 %	4.1 %

2	49.4 %	19.7 %	11.9 %	3.5 %	10.6 %	4.9 %
3	38.1 %	27.1 %	15.8 %	4.7 %	9.5 %	4.8 %
4	36.3 %	32.8 %	16.1 %	4.3 %	7.0 %	3.4 %
5	35.0 %	32.8 %	17.1 %	4.1 %	7.6 %	3.5 %
6	56.5 %	18.4 %	10.0 %	2.5 %	8.1 %	4.5 %
7	38.8 %	30.3 %	15.7 %	3.9 %	7.6 %	3.8 %
8	32.6 %	34.9 %	18.2 %	4.7 %	7.1 %	2.5 %
9	18.8 %	23.5 %	19.3 %	6.5 %	20.1 %	11.7 %
10	13.2 %	19.4 %	20.4 %	7.0 %	26.8 %	13.2 %
11	15.9 %	16.5 %	18.8 %	5.4 %	28.9 %	14.6 %
12	4.0 %	12.6 %	21.3 %	6.7 %	36.9 %	18.5 %
13	14.4 %	17.2 %	18.5 %	5.0 %	28.8 %	16.2 %
14	15.0 %	13.7 %	15.5 %	4.9 %	32.6 %	18.3 %

Comparing the statistics in the above tables¹, it is easy to see why those in the southern parts of Dallas feel slighted or at a disadvantage.

a. Health, Welfare and Environment

The southern sector of the City is dotted with vacant industrial properties, old gasoline stations or strip-centers that housed those businesses which became economic victims to the growth along the highways around Dallas and the migration of resources out of the neighborhoods to the major highways. Then, with the advent of the “supermarket” and “big-box” retailers, many of the remaining “mom and pop” shops simply could not compete and closed their doors. All the while, the families in these areas that could afford to move did and those who could not were left behind to deal with the repercussions of the economic evacuation from their communities. The following table shows the disparity between the northern and southern sectors regarding the total amount of industrial, office and retail space in the City of Dallas.

City of Dallas Commercial Space by City Council District								
Council District	Total Commercial Inventory (Sq. Ft.)	% of City of Dallas	Industrial Inventory	% of City of Dallas	Office Inventory	% of City of Dallas	Retail Inventory	% of City of Dallas
Southern Sector								
1	4,760,097	1.2%	1,426,873	0.7%	849,116	0.7%	2,492,108	3.5%
2	70,249,373	17.6%	36,487,929	18.1%	25,498,278	20.5%	8,263,166	11.5%
3	40,420,317	10.2%	36,144,302	17.9%	1,047,653	4.5%	3,228,362	4.5%
4	5,484,651	1.4%	3,093,879	1.5%	136,958	0.1%	2,253,814	3.1%
5	6,031,362	1.5%	3,386,920	1.7%	165,873	0.1%	2,478,569	3.4%
6	82,690,708	20.8%	72,206,930	35.8%	4,631,853	3.7%	5,851,925	8.1%
7	13,302,437	3.3%	9,713,594	4.8%	942,431	0.8%	2,646,412	3.7%
8	14,247,642	3.6%	9,009,620	4.5%	481,333	0.4%	4,756,689	6.6%
Northern Sector								
9	9,534,100	2.4%	3,600,359	1.8%	754,501	0.6%	5,179,240	7.2%
10	20,433,088	5.1%	14,473,923	7.2%	2,775,722	2.2%	3,183,443	4.4%
11	31,093,439	7.8%	5,655,121	2.8%	17,489,009	14.0%	7,949,309	11.0%
12	9,917,066	2.5%	957,535	0.5%	4,788,272	3.8%	4,171,259	5.8%

¹ City of Dallas Office of Economic Development Dallas-EcoDev.org
<http://www.dallas-ecodev.org/resources/publications/council-district-facts/>

13	22,302,193	5.6%	567,217	0.3%	14,001,555	11.2%	7,733,421	10.7%
14	67,694,896	17.0%	4,899,635	2.4%	51,008,123	40.9%	11,787,139	16.4%

These empty businesses became focal points for graffiti, vandalism, drugs and other crimes further depressing the situation. Silently and out of sight, chemicals used in some of these now closed businesses spilled out of tanks and containers through aging valves or faulty pipes and impacted the soil and groundwater in these areas. Gasoline left in underground tanks, gauged for years by "sticking" found its way through minute cracks in dents and along seams into the ground. And the paints and insulations installed in times before their ingredients were known to be harmful flaked and chipped, migrating into the surrounding area through active vectors or the slow hand of erosion. Opportunity, when it does knock, usually comes in the form of someone seeking picturesque areas with ample resources; run-down garages and boarded, graffiti-ridden shops seldom qualify.

Additionally, as these businesses closed their doors, the jobs that these businesses provided to their local community were also lost. Thus, the local residents were forced to seek employment outside their local area, which lead to more cars and more driving time to reach their jobs. Ultimately, the increased travel to find jobs also increased the air pollution in the area, with Dallas become an ozone non-attainment zone. Redeveloping these Brownfields and bringing jobs back to the local communities will help reduce air pollution and improve air quality in the Dallas area.

b. Financial Need

During the recent economic crisis, the loss of jobs by individuals and the close of businesses within the Dallas city limits has reduced the City's tax revenue by over 50% from 2007 levels. Although the City commits a number of resources to economic and community development initiatives, the massive loss in tax revenue has resulted in lay-offs of over 900 City employees and furloughs for City employees and a drastic reduction in City services. Thus, the City is not able to fund economic and community development initiatives to the level that we would prefer.

With information in-hand regarding the disparity between the northern and southern council districts described above and many of the major obstacles identified, the City Council began, and continues its work removing the physical and economic barriers which have isolated sections of the community from services, split families apart, and led to unfair economic advantages. The City Council initiated the creation of community development programs, the introduction of Tax Increment Finance (TIF) districts, Public Improvement Districts (PID), Neighborhood Investment Programs (NIP) and the creation of an internal Brownfields program.

The goal of these initiatives and the use of these resources is to jump-start development, find productive uses for land, stimulate job creation as a means to encourage economic revitalization and to increase long-term commercial and residential interest in the area. The Brownfields grant will be utilized by the City of Dallas throughout the city with the main focus on the southern council districts to help document the extent to which derelict structures and abandoned spaces may be contaminated with both hazardous materials and/or petroleum. The petroleum site funds, should they be awarded, will be used to conduct Phase I and Phase II assessments. The City has a contingency fund in place, but currently at drastically reduced levels, which is being utilized to help conduct these assessments as well as providing the funding necessary to remove and

mitigate leaking petroleum storage tanks. The Brownfields funds will help avail the contingency fund to address more sites which will help prepare more areas for redevelopment. The hazardous site funds, should they be awarded, will be used to conduct Phase I and Phase II assessments on properties which sit abandoned. With an aging infrastructure, some City facilities are due to be removed and replaced. However, the added costs of assessing the hazardous materials potential in these structures can be prohibitive to proceeding. With these funds, the City can assess aging structures and determine if their demolition would present any additional hazards outside of normal demolition impacts. Those structures found to be free of hazardous materials could then be razed and bond monies approved by the voters of Dallas could then be used to redevelop the City services in their communities bringing back a presence of community pride and civic awareness.

V.B.2 Project Description and Feasibility of Success

a. Description and Feasibility

During the recent economic crisis, the loss of jobs by individuals and the close of businesses within the Dallas city limits has reduced the City's tax revenue by over 50% from 2007 levels. The City of Dallas views the EPA's Brownfields Program as a vital component of the City's economic redevelopment strategy. If the City is successful in receiving Brownfields assessment grant funding, we will use the money to revitalize our Brownfield Program and focus redevelopment in the communities that need it most. Through this program, the City will provide Phase I and Phase II Environmental Site Assessments and cleanup plans for eligible properties. The Brownfields Program will be managed by the City's Office of Environmental Quality (OEQ). The OEQ staff have the greatest knowledge of the locations of blighted and industrial properties within in the City and routinely work with the various City Departments. OEQ staff will be able to guide other City Departments in the optimal properties to select for redevelopment to enhance the communities in the City's southern sector. The City will focus it's redevelopment efforts in the City's southern sector, which contains the highest concentrations of blighted, vacant and industrial properties, in the areas with the greatest economic need.

Although focused for highest probable success, viable, eligible properties ranked high by the community will not be ignored for assessment if funding is available. As with any large-scale redevelopment effort, the process must begin with an analysis of the environmental condition of the area targeted for redevelopment. To that end, the City of Dallas proposes to use Brownfields Assessment funding to conduct an inventory of potential Brownfields sites within the City's southern sector to support the completion of Phase I and, if necessary, Phase II Environmental Site Assessments. The information and data collected will be used to fully support redevelopment efforts in the City's southern sector. EPA Brownfields assessment grant dollars will not be the only source of funding. The City will bolster redevelopment efforts through tax incentives and other mechanisms to provide the highest degree of success to the target area. The Dallas Brownfields assessment program will provide concurrent public engagement and technical support. The public involvement is intended to build a community focus of improving environmental conditions by addressing immediate issues of environmental impairment on existing Brownfields identified by inventory, ranking and prioritization. The program will use the assessments to resolve issues of contaminant stigma impairing redevelopment and to prevent future Brownfields by identifying workable elements of sustainability and green building for restoration of the properties.

The City will create a comprehensive, interactive community outreach program to identify, contact, educate, and seek input from existing owners, the general community, potential buyers/developers, and all affected stakeholders. This process will provide valuable insight from residents on site prioritization, future land use, and remediation planning. It will also allow us to engage the positive possibilities of Brownfield's redevelopment and future Brownfields prevention to the public.

b. Budget for EPA Funding and Leveraging Other Resources

i) Budgeting

	Task 1	Task 2	Task 3	Task 4	Task 5	Subtotals
Budget Categories	Programmatic Activity, Reporting and Closeout	Inventory, Eligibility, Ranking and Prioritization	Community Outreach/ Engagement, Site Access	Assessment, Quality Process, Project Plans	Cleanup Planning	
Personnel ¹	\$0	\$0	\$0	\$0	\$0	\$0
Travel ²	\$7,000	\$0	\$0	\$0	\$0	\$7,000
Supplies: public notices, printing, postage	\$0	\$0	\$1,000	\$0	\$0	\$1,000
Contractual	\$5,000	\$15,000	\$8,000	\$139,000	\$25,000	\$191,000
Petroleum:	\$12,000	\$15,000	\$9,000	\$139,000	\$25,000	\$200,000
Personnel ¹	\$0	\$0	\$0	\$0	\$0	\$0
Travel ²	\$7,000	\$0	\$0	\$0	\$0	\$7,000
Supplies: public notices, printing, postage	\$0	\$0	\$1,000	\$0	\$0	\$1,000
Contractual	\$5,000	\$15,000	\$8,000	\$139,000	\$25,000	\$191,000
Hazardous Substances:	\$12,000	\$15,000	\$9,000	\$139,000	\$25,000	\$200,000

¹ Personnel salaries and benefits will be covered by the City of Dallas

² This will include travel and lodging costs for two employees to Partners Forums and Brownfield Conferences

Task 1: Programmatic Activity & EPA Reporting: This task funds programmatic implementation, documentation, and execution of programmatic elements of the combined EPA grant. This task includes staff meetings and submittal of EPA reports through ACRES, Final Closeout documentation, eligibility determinations with agencies' and Brownfields environmental professional contractor selection in support of these efforts. This task also includes funds for travel and lodging costs for two employees to attend Partners Forums and Brownfield Conferences

Task 2: Inventory, Ranking and Prioritization: This task will expand the preliminary information used to prepare this application. This task will create a numerically-ranked inventory of Brownfields properties through a systematic quantitative process to rank and prioritize properties. The process will be equitable under public scrutiny, incorporate community priorities identified in Outreach and will be tied directly to the citizen-determined goals developed during Public Outreach. The inventory will also include a database that is linked to the City's GIS system to allow City personnel access to existing and potential Brownfield redevelopment information

Task 3: Community Outreach and Engagement: Within this task, Dallas and its environmental Contractor will educate and engage the public in our Brownfields program. Dallas will develop a Public Involvement Plan (PIP) with up to six updates, complete a minimum of six public outreach activities, of which at least will be interactive community sessions and create a minimum of five fact sheets. Additionally, the City will provide bilingual staff that speak Spanish during the Public Outreach events to provide translation for Spanish-speaking residents and translate fact sheets to ensure proper communication with the community in the southern sector.

Task 4: Quality Project Plans, Access, Site Assessments: This task funds all environmental site assessment work on eligible properties to be done over the course of the project period. This task includes costs for the preparation of a community-wide Generic Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP). This task budget also includes the completion of a minimum of 20 Phase I Environmental Site Assessments (ESAs) and reports (10 sites for Petroleum and 10 sites for hazardous substances at an average cost of \$2,500 to \$4,000 per site, five Phase II Petroleum ESAs and reports at an average cost of \$12,000 to \$20,000, five Phase II Hazardous Substance ESAs and reports at an average cost of \$12,000 to \$20,000. Phase I ESAs will provide All Appropriate Inquiry required by EPA using an Environmental Professional and ASTM E1527-05. Phase I ESA reports will differentiate hazardous substance, petroleum and potentially co-mingled recognized environmental conditions.

This task will establish a formal quality process for assessments to produce quality data for decision-making. Prior to conducting field sampling on accessible properties, the City through its consultant, will develop for every property eligible for assessment a Property-Specific Sampling & Analysis Plan containing approved-QAPP and Health and Safety Plan requirements specific to the property. These will be reviewed and approved by EPA prior to implementation. The number of samples and type of analysis will be determined by the Phase I Environmental Site Assessments' identification of ASTM E1527 Recognized Environmental Conditions and Other Business Risk Considerations.

Task 5: Cleanup Planning: The City's Brownfields program intends to move assessment information to the community for use by actual and potential redevelopers as soon as possible to be effective. This requires evaluation of a property's environmental assessment findings relative to effects on future redevelopment. Phase II data alone will remove uncertainty for some properties and cleanup planning will not be needed. The City plans to complete a total of 5 Cleanup Plans for eligible sites during the grant period, to be focused on sites with the greatest potential or interest in redevelopment.

ii) Leveraging

The City of Dallas has a history of leveraging resources for Brownfield redevelopment and is already leveraging resources in the southern sector of the City. Since its inception, the City of Dallas Brownfields Program, has cleaned up and redeveloped over 1,200 acres of Brownfields, leveraged over \$109 million in private and \$1.9 million in federal funds, and assisted in the creation of more than 1,700 jobs².

² Brownfields Showcase Community Fact Sheet. http://www.epa.gov/brownfields/success/showcase/sc_dalla.htm

Dallas, being land-locked by the surrounding communities within Dallas County, faces a unique opportunity in that resources can be dedicated toward the redevelopment and improvement of existing infrastructure rather than being spent trying to build new infrastructure in one area while replacing it in another. The existing infrastructure provides unique cost savings for redevelopment projects, which reduce a portion of the development costs and promote the redevelopment of Brownfields.

The City of Dallas has numerous economic development incentives and packages that are available to help encourage redevelopment in the City. The City Council has authorized the following incentive programs aimed at revitalizing our community.

- **City of Dallas Regional Center (CDRC)** The CDRC is dedicated to assisting individuals and their families through the EB-5 immigration process via investment into businesses and development projects located within the Dallas city limits. The CDRC offers a variety of qualified investments to foreign investors that meet or exceed Program requirements, and offer investors features unique to the EB-5 community.
- **Economic Development Grants** Companies considering a relocation/expansion or new commercial development may be eligible for a grant in lieu of tax abatement or to defray project costs such as: land purchase, building costs, public infrastructure costs, development fees, right of way abandonment fees, loan guarantees, training costs, relocation costs, etc.
- **Foreign Trade Zone** Dallas' two Foreign Trade Zones allow duty-free importing of foreign-made components that are assembled, manufactured, processed or packaged. Duties are charged when completed products are distributed into the U.S. market. Products for export are not taxed.
- **Freeport Tax Exemptions** Ad valorem tax exemptions for goods that are detained in Texas for 175 days or less. Incentive depends on location.
- **Historic Tax Incentives** Abatement of city real property taxes for a period up to 10 years if a building has been designated as a Dallas landmark and a restoration is planned.
- **Job Training** Workforce development in Dallas is coordinated and implemented by the Dallas County Community College District (DCCCD) and Workforce Solutions Greater Dallas. DCCCD opportunities include: basic skills, GED preparation, and skills enhancement. Workforce facilitates employer access to qualified employees, as well as provides job training, workplace education, child care and educational initiatives.
- **Municipal Managed Districts** MMDs are special districts that are self governed, but are approved by the host municipality. Through their fundraising powers they can provide infrastructure and other services within the district according to a district-approved service plan.
- **New Market Tax Credits** The NMTC program is a federal program operated by the Department of Treasury that provides opportunities for new development in traditionally underserved areas. Corporate or individual investors can receive tax credits for qualified investments.
- **Public Improvement Districts** Special districts created by petition to privately fund public improvements or special supplemental services over and above those provided by

the City, when such services are supportive of related City investments in capital improvements.

- **Tax Abatements** City provides tax abatement on the value added to real property or new business personal property.
- **Tax Increment Financing** Special districts funded with increased tax revenues resulting from new private development. Tax rates are the same as elsewhere in the City and no added cost to private parties is incurred.³

These incentive programs have been implemented to bring resources to those areas which are in the greatest need as a priority. The following table identifies target areas in which the City Council has focused resources and materials to attract redevelopment to spur economic growth and restoration of community. These areas have been identified based on the history of the area and the current needs which have arisen from that history as previously discussed. Within each of the target areas of the community programs, there are multiple locations, public and private, which could be redeveloped if the resources should become available. But as with any effort, the first step must be taken and in many of these areas that first step is hindered by the unknown—not knowing what threats may exist hidden from plain sight within the buildings, the soils and/or the groundwater. In addition, these areas are the focus of community building initiatives to help restore a sense of pride in the area. The hope of these efforts is to keep the residents and businesses in these areas “local” when they shop, dine or just relax.

City of Dallas Community Programs Target Areas		
Community Program Target Area	Council Districts	City Sector
Bachman Lake Target Area	2, 6	Southern, Northern
Jubilee Park Target Area	2, 7	Southern
Lake Highlands Target Area	10, 11	Northern
North Oak Cliff Target Area	1	Southern
Oak Lawn Target Area	2, 14	Southern, Northern
Old East Dallas Target Area	2, 14	Southern, Northern
Pleasant Grove Target Area	4, 5, 8	Southern
South Dallas Target Area	4, 7	Southern
South Oak Cliff Target Area	8	Southern
West Dallas Target Area	1, 6	Southern
West Oak Cliff Target Area	1, 3, 6	Southern
White Rock Hills Target Area	7, 9	Southern, Northern

These areas also pattern closely the TIF districts which have been approved by City Council. These TIF districts allow for redevelopment at a reduced burden to those willing to “take the chance” on an area which has seen its share of hard times despite the conditions which brought on those conditions.

In the years since, the City of Dallas has offered multiple TIF districts to help the areas in the community which have seen diminished economic activity as a result of economic or physical barriers including those challenged with chemical contamination.

³ Incentives negotiated or proposed by City Staff are subject to specific Federal, State and Local guidelines, funding availability and City Council approval. Depending on the incentive, there may be additional restrictions based on geography, project size and other factors.

The following table identifies the TIF districts and the council districts and city sectors that they serve. The TIF districts largely lie within the Community Program Target Areas identified in the previous table, and have seen an increase in redevelopment through leveraged resources, civic involvement and community engagement.

City of Dallas Tax Increment Finance Districts		
Tax Increment Finance District	Council Districts	City Sector
Cedars	2, 7	Southern
City Center	2	Southern
CityPlace	2, 14	Southern, Northern
Davis Garden	2	Southern
Deep Ellum	2	Southern
Design District	2	Southern
Downtown Connection	4, 7	Southern
Farmers Market	2	Southern
Fort Worth Avenue	1, 3, 6	Southern
Grand Park South	2, 7	Southern
Maple-Mockingbird	2	Southern
Oak Cliff Gateway	1, 6	Southern
Skillman Corridor	9, 10, 13	Northern
Southwest Medical District	2	Southern
Sports Arena	2	Southern
TOD	4, 7	Southern
Vickery Meadow	13	Northern

Overall, taxable real property value in the TIFs decreased by 1.3% over the previous year in contrast to the 3.9% decrease seen throughout the rest of the city. Most importantly, the leveraging of \$506 million in TIF expenditures or allocations across the districts since their respective inceptions has yielded nearly \$6.2 billion in added property value. For every TIF dollar committed, \$12 was returned in private investment⁴. The model works. And with Brownfields grant funds, we hope to be even more successful across the city by freeing up other resources for mitigation that we can offset with assessment grant money.

Dallas, once glamorized on television as the home to wealthy oil-barons and the women who love them, is a city rich in diversity, ever growing and adapting, and working toward sustainability.

With our partners in the community, the City is working to ensure the growth we encourage is best for the residents of Dallas and for the region. Growth for the sake of growth is the model which failed us. Today, we work with groups like Habitat for Humanity and the U.S. Environmental Protection Agency to build greener homes for low-income residents. We are utilizing ARRA funds to help weatherize homes to reduce energy consumption and stimulate our economy through the employment of trades-people who help implement the technologies which will make weatherization possible. We partner with other cities in our COG to develop a

⁴ Economic Development Committee of the Dallas City Council Summary Briefing for FY 2009
http://www.dallas-ecodev.org/SiteContent/66/documents/Incentives/TIFs/all_tifs_annual_report_fy09.pdf

regional vision which will guide all our efforts to ensure we are creating the community our residents demand. We work with Dallas County to help streamline services to eliminate overlap and gaps to better serve the needs of our residents. We work with Dallas County Community Colleges to help develop environmental curriculum and raise awareness at school sponsored events. We participate with school-children at Dallas ISD events to educate them on how they can make a difference at home and help keep their communities clean. We couple other grant awards together with new funding opportunities to help increase the synergy and accomplish more than either could do alone. We engage private entities to balance their environmental footprint and recognize those who succeed in their efforts through the Mayor's Environmental Excellence Awards. We participate with non-profit groups working to increase community stewardship, redevelopment, and environmental awareness as we continue to refine our Environmental Management System through our Office of Environmental Quality to minimize our own footprint to set the best example possible.

Through all of our efforts, we are working to build a greener, more sustainable Dallas. A Dallas that will be able to provide not just the jobs our residents need, but the safe learning environment our children need to grown into successful adults and the clean neighborhoods our families need to build a stronger sense of community and reduce crime by being outside and present in the neighborhood deterring the behaviors which lead to decline and the pattern of neglect we are working to overcome. We are also working to ensure the environmental benefits we enjoy today are around for generations to come. Through the strategic application of all funding sources available to us, we are able to make what we have go farther and to accomplish more in a shorter amount of time.

c. Programmatic Capability

If awarded, the project will not be the first Brownfield Grant managed by the City, but it will be the first Brownfield Grant managed by the Office of Environmental Quality. The City will draw on years of internal and external experience in the administration and management of a variety of federal and state grant programs. The following are five recent federal contracts and/or grant programs successfully managed by the City of Dallas.

Project Date	Project Name	Project Description	Federal Funding Agency
2010	I-55 Interchange	Connector Roads to I-55 Interchange, Mississippi Dept. of Transportation, Jackson, MS, \$5,000,000, City of Ridgeland, MS, For I-55 interchange connector roads improvements	FHWA
2007	Old Canton Road Widening	Widening of a 2-lane road to a 5-lane road from the Natchez Trace to Lake Harbour Drive	FHWA
2007	County Line Road Widening	Widening of a 2-lane road to a 5-lane road from Old Canton Road to Pear Orchard Road	FHWA
2006	Old Canton Road Rehabilitation	Project included the milling and pavement overlay of a 5-lane road	FHWA

2005	County Line Road Rehabilitation	Project included the development of a median along the turn lane, installation of landscaping with irrigation, and milling and pavement overlay.	FHWA
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To date, the City of Dallas has not been the subject of any adverse audit findings on the projects listed above or any other government-funded grants or cooperative agreements.

Financial & Compliance to Governing OMB Circulars: The City of Dallas Office of Environmental Quality (OEQ) will assume primary responsibility for management and administration of the Brownfields Assessment Grant funds. The OEQ is an administrative unit of the City of Dallas specifically charged with assisting in the proper implementation and compliance with environmental laws and regulations. The OEQ is comprised of a staff of 22 individuals that include the Director, inspectors, environmental specialists, Environmental Management System specialists, emergency response specialists, and associated support staff. In addition to general oversight of the project, the OEQ will work closely with the City's accounting departments to ensure quarterly and final financial reports to EPA are properly prepared and submitted in a timely manner. While the OEQ will have primary responsibility for program oversight, the City will use a team approach for the management and administration of the grant program.

EPA Programmatic Compliance: Without previous experience in the Brownfield program, we understand the importance of compliant grant management. In preparing this application we talked with representatives of other EPA Cooperative Agreement Recipients. To provide proper skills, Dallas will competitively select a Brownfields professional/contractor on the basis of qualifications. The selected contractor will assist/train the City in grant processes, Property Profile Forms/ACRES Reporting, Quarterly Reporting, Annual Reporting, Closeout Reporting, and Post-Grant Data Collection. Contractor qualifications will require a minimum of 5 years experience in the EPA Brownfields Assessment Program, a minimum of 5 EPA Brownfield Cooperative Agreements of which at least one has been through Closeout, all without negative audit nor return of funds to agency for ineligible expense.

V.B.3 Community Engagement and Partnerships

a. Public Involvement Plan

Community engagement will not be simply about meetings. A project kick-off meeting with EPA will be designed to notify the public of the availability of Brownfields funding and to communicate the various project phases and processes undertaken during project implementation. Once the Brownfields inventory, ranking and prioritization processes have been completed, those property owners whose properties have been selected and included in the inventory will be engaged to provide information to clarify the Phase I and Phase II ESA processes and to solicit feedback on known environmental issues specific to their properties. It is anticipated that opportunities will be given for one-on-one consultation with property owners reluctant to publicly discuss environmental concerns associated with their property, and to obtain signed access agreements designed to facilitate access to properties identified for Phase I and/or Phase II ESAs. It is anticipated that the access agreements will allow access during the life of the project. At least two status meetings will be conducted during the Site Assessment phase of the project to provide updated information on project progress. A final community outreach

meeting will be conducted to communicate project successes and to ensure that community visions remain consistent with the objectives for redevelopment of Brownfields properties. Other meetings will be conducted as deemed necessary by the City of Dallas so that project milestones, goals, objectives and activities are appropriately communicated to the public. According to Census Data, up to 44% of the population of the City of Dallas is non-English speaking (i.e. Spanish-speaking). An interpreter from the City of Dallas Office of Environmental Quality will be present at public meetings as necessary to address the information needs and concerns of the Spanish speaking population. Fact sheets will be prepared in two primary languages (English and Spanish) based on the City's demographics.

Task 1 Engagement Outcomes: The City will develop with its Contractor the Public Involvement Plan to guide efforts. Outreach will augment City efforts with one-on-one meetings with key property owners, larger meetings with primary stakeholders, and community-wide meetings for general education and information gathering/sharing purposes. Implementation of Task 1 will engage the public with the importance, value and limitations of environmental assessments. Implementation of Task 1 will increase the knowledge of Brownfields redevelopment/ prevention allowing an engaged community to make balanced decisions of risk-to-value. This task will create a public repository of information for storage and maintenance of the inventory and final project documents, allowing the public traditional paper and electronic access. To promote electronic access, but not re-invent the 'wheel' and save costs, Dallas will build from its existing GIS system.

b. Community Partnerships

The City of Dallas has established working relationships with the following groups or agencies in implementing it's previous Brownfields Program or currently working with existing Brownfield sites within the City:

- Texas Commission on Environmental Quality
- North Central Texas Council of Governments (Dallas received a RLF subgrant)
- Vecinos Unidos
- Innercity Community Development Corporation

The City is fully engaged with these partners and welcomes their involvement and participation in the project implementation process and public outreach component of the proposed project. The general public typically communicates varying levels of concern in discussions related to environmental contamination and the extent to which that contamination may have a potential impact on public health. The above-mentioned agencies will be engaged as part of community outreach to communicate facts associated with known environmental conditions and to effectively manage public concerns associated with environmental contamination.

c. Community-based Organizations

The following community-based organizations (CBOs) have previously been engaged as active partners in the Dallas Brownfield Program, and will continue to be actively involved should Dallas be awarded Grant funds. The determination of site selection values, ranking and prioritization to be done with CBOs and community volunteer

participation at large. They will provide an objective analysis of sites presented for consideration.

These groups will provide a vital link between the City and potentially affected neighborhoods by facilitating communication of project goals, objectives, outcomes, and opportunities to neighborhood residents. The leadership of the CBOs will work closely with the City and their selected consultant to facilitate community outreach and involvement in their respective neighborhoods.

- **Innercity Community Development Corporation**
- **Vecinos Unidos**
- **South Fair CDC**
- **South Side Corridor Development Corporation**

Each of the CBOs listed above are located within the southern sector of the City and have a vested interest in creating a more vibrant community and revitalizing run down neighborhoods.

V.B.4 Project Benefits

a. Welfare and/or Public Health Benefits

The City will gain a level of environmental knowledge of assessed sites that will allow the City to mitigate environmental issues and to clear the way for increased southern sector redevelopment. The proposed project will also allow for the potential mitigation of community health hazards specifically related to contaminated sites that contain known carcinogens which have been linked to incidents of cancer or other illnesses. Project task-specific outcomes toward public health are;

Task 4 Assessment Outcomes: During sampling and monitoring well construction the disturbance of soils have the potential to create exposures. The City of Dallas will work closely with property owners and the selected consultants to restrict site access during Phase II assessment activities. Ambient air and dust control/monitoring will be conducted as part of Health and Safety by sampling contractors. All monitoring wells will be removed and grouted to permanently close the wells once the assessments have been completed. Circumstances may necessitate the operation of wells on a long-term basis for monitoring purposes. In these cases, care will be taken to properly identify the monitoring wells and to limit exposure. Precautions will include, but will not necessarily be limited to the placement of all monitoring wells in steel casing with a padlocked cap designed to limit access and exposure. Sample pits created during the assessment process will be returned to their original state as quickly as possible to maintain public safety.

Task 5 Cleanup Planning Outcomes: Evaluation will position a property for developer consideration or future cleanup grant applications. Phase II ESA reports may include this evaluation as an appendix entitled *Analysis of Brownfield Cleanup Alternatives (ABCA) for Planning*. The appendix will be inclusive of potential technical approaches to cleanup, potential costs to clean up contaminants to different land use scenarios, and considerations of interim property management between assessment and redevelopment.

Interaction and planning will include identifying funding sources available. The Texas Commission on Environmental Quality will be engaged and VCP or petroleum program risk-based assessment methodologies used to evaluate contaminant mitigation options and to align cleanup objectives are in concert with end-use and public protection. The City will identify potential Brownfields financing mechanisms to promote private or public/private partnership development efforts. Brownfields take time. Redevelopment takes time. Brownfield purchasers have statutory continuing obligations to preserve Brownfields liability protection. Having evaluated Brownfields issues and possibly contamination, Dallas does not intend to walk away until some developer arrives. Our Brownfields Initiative program intends to be responsible and manage interim risk for the community. Phase II ESA reports will an option to contain an appendix titled *Suggested Interim Brownfields Media Management Plan*, should a contaminated property need to site idle for a period of time awaiting cleanup funding or developer interest. A non-binding plan, it will provide property owners/managers, public utilities and services and private contractors (e.g., landscapers, cable companies) a practical, cost-effective document to summarize environmental conditions in layman's terms in conjunction with Phase II ESA findings and responsibly manage soil and groundwater as part of their operations and employee health and safety programs. It is probable that the new ASTM Continuing Obligations standard will receive final ballot by 2011. Media Management Plans will incorporate the new ASTM process.

b. Economic Benefits and/or Green Space

The strategies for environmental assessment and subsequent redevelopment activities as communicated in this proposal are directly related to recommendations included in the City's Brownfield redevelopment plans. Through the implementation of activities proposed for Brownfields Assessment Grant funding, the City will be provided the resources and mechanisms necessary to address environmental issues that may exist as an impediment to recommended redevelopment processes. The implementation of this project will serve to facilitate the expansion of the City's tax base by allowing older, less productive properties to be redeveloped to their highest and best use for the City. The revitalization of these areas will bring much needed jobs to the southern sector of the City, providing more tax dollars for additional revitalization. Each Brownfield acre has the potential to create 91 follow-on jobs during construction and operation.⁵ Recent economic modeling predicts that an annual tax flow of \$54,700 is created from jobs per each redeveloped acre of Brownfields.⁶ The project will also serve to clear the way for a number of public projects that are designed to improve the delivery of municipal services from the City to its citizenry, including libraries, parks and other city services.

c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

The Brownfield projects within the City of Dallas will be able to take advantage of existing utility, roadway and other infrastructure. Due to the existing infrastructure within the City, the City offers sustainability of redeveloped properties and community health

⁵ *The Environmental and Economic Impacts of Brownfields Development*, Northeast-Midwest Institute, 2008.

⁶ *Employment Effects of Brownfields Redevelopment*, H. Marie, Journal of Planning Literature, 2007.

and wellness benefits associated with mixed-use developments that encourage promotion of pedestrian and other non-motorized access opportunities.

Part of the design goals within the City's Brownfield Program are to achieve 33% to 57% reduction in vehicle miles traveled and a reduction in emissions and greenhouse gases. Sustainable Brownfield reconstruction provides for an estimated 47% to 62% reduction in storm water runoff⁷. Sustainable reconstruction of 1 acre of brownfield property is estimated to "save" 4.5 acres of greenfield as expanding sprawl⁷. Projecting forward our minimum of 100 acres of Brownfields for focus areas results in 450 acres preserved. Project-specific benefits delivered toward sustainability are renewable energy resource analyses (wind, solar and geothermal), mapping for placement of LEED™ water and habitat features and transportation streetscapes to not infiltrate waters into contaminants and change groundwater quality, and Infrastructure Reuse Assessments for structure preservation lifecycle analysis and deconstruction cost recovery/architectural salvage.

d. Progress Tracking Strategies

EPA expects measurable results and is required to demonstrate to Congress that Brownfields funds are being appropriately applied and benefit realized in a timely manner. The City understands that grant outputs and outcomes are intended to be linked to EPA's Strategic Plan and goals. The City will develop a detailed tracking, with quantified outcomes and schedules, at negotiation of the Cooperative Agreement similar to the *example* below or as agreed with EPA in the Cooperative Agreement.

Task	Grant Activity Output & Measurement	Grant Activity Outcome
2	Create a Public Involvement Plan (PIP) <i>Measure:</i> PIP by Q2.	Increased and routine effectiveness by the City in engaging the community. PIP will include considerations for environmental justice, environmental education and bringing the needs of the community into Brownfields decision making processes
5	Website Design <i>Measure:</i> Update quarterly as information is generated with Phase I and Phase II ESA reports, work plans and other documents developed under grant.	Increased number of people accessing information. Feedback of increased accessibility and understanding. Increased citizen participation at events and increased developer interest and/or increased development.

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 30, 2010

Mr. Kris Sweckard
Office of Environmental Quality
City of Dallas
1500 Marilla Street, L2FS
Dallas, TX 75201

Re: City of Dallas Application for a U.S. Environmental Protection Agency Brownfield
Community-wide Combined Petroleum and Hazardous Materials Assessment
Grant

Dear Mr. Sweckard:

The Texas Commission on Environmental Quality (TCEQ) is pleased to offer this letter of support for the City of Dallas's application to the U.S. Environmental Protection Agency for a Brownfields Community-Wide Combined Petroleum and Hazardous Materials Assessment Grant. The TCEQ believes that the grant will significantly benefit the City of Dallas by enhancing the local economy, increasing the tax base, and improving the environment.

The TCEQ looks forward to working with the City of Dallas on its Brownfields initiative and supports the grant application. You may contact me at 512-239-0843 or cwhitney@tceq.state.tx.us with any questions or if you need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Whitney", is written over a horizontal line.

Christine Whitney, Brownfields Manager
VCP-CA Section
Remediation Division

CW/jdm

cc: Ms. Monica Smith, Chief, Brownfields Section, smith.monica@epa.gov
Mr. Kevin Lefebvre, City of Dallas; kevin.lefebvre@dallascityhall.com